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To the 2020 Dietary Guidelines Advisory Committee and Dr. Stoody:

ILSI North America welcomes this opportunity to provide comments to the 2020 Dietary Guidelines Advisory Committee (DGAC). ILSI North America is a public, non-profit organization that actively collaborates with government and academia to identify and resolve scientific issues important to the health of the public. ILSI North America is a member of the global federation of entities chartered by the International Life Sciences Institute. The organization carries out its mission by sponsoring relevant research programs, professional education programs and workshops, seminars and publications, as well as providing a neutral forum for government, academic, and industry scientists to discuss and resolve scientific issues of common concern for the well-being of the general public. ILSI North America’s programs are supported primarily by its industry membership.

Our comments in this letter are specific to three NESR questions/topics, as outlined below:

1. **Describe/evaluate current dietary patterns and beverages.**

It was stated during the DGAC Meeting #2 held on July 10, 2019 that the Healthy Eating Index (HEI) is the only generally accepted and validated measure available to evaluate dietary patterns. However, the HEI has limitations in terms of how it captures specific dietary components that are related to health outcomes, for example, it does not directly consider demonstrated relationships between specific dietary bioactives and health outcomes. This is directly relevant to this DGAC topic since bioactive components are found in commonly consumed beverages such as tea, coffee, and fruit juices. A systematic review supported by the ILSI North America Bioactives Committee and accepted for publication in the *American Journal of Clinical Nutrition* (Raman et al. 2019, “Dietary Intakes of Flavan-3-ols and Cardio-metabolic Health: Systematic Review and Meta-analysis of Randomized Trials and Prospective Cohort Studies”) summarizes the beneficial effects of flavan-3-ol consumption on cardiometabolic outcomes. Translating this evidence into beverage recommendations would be of benefit to public health.

2. **What is the relationship between dietary patterns consumed and neurocognitive health?**

The protocol for this question includes a wide array of neurocognitive health “outcomes” many of which encompass several distinct cognitive domains. Although there is no authoritative consensus on which test is most appropriate given the outcome of interest, ILSI Europe has published guidance to assist
researchers with the selection of cognitive markers specifically validated for detecting the effects of food and nutrients on cognitive outcomes. The paper referenced below is available as an open access article at the link provided, and a PDF is attached to this comment for reference:


3. What is the relationship between dietary patterns consumed and risk of cardiovascular disease?

The DGAC draft protocol indicates that “Studies must describe the dietary pattern being tested or examined, including, at a minimum, the foods and beverages in the pattern.” Including a wide array of substantiated dietary patterns may best capture those linked to optimal health benefits. Flavonoid-rich diets are an example of diet pattern(s) characterized by a short list of high flavonoid foods. As an example of recent evidence supporting the benefits of flavonoid-rich diets, a systematic review supported by the ILSI North America Bioactives Committee and recently accepted for publication in the American Journal of Clinical Nutrition (Raman et al. 2019, “Dietary Intakes of Flavan-3-ols and Cardio-metabolic Health: Systematic Review and Meta-analysis of Randomized Trials and Prospective Cohort Studies”) documents the beneficial effects of flavan-3-ol consumption on cardiometabolic outcomes. This evidence presents an opportunity to translate flavonoid-rich diets into recommendations with the potential to benefit the health of the public.

ILSI North America applauds the DGAC for their work and diligence toward evidence-based recommendations and the continued enhancements to the process since 2010.

With Sincere Regards,

Alison Kretser, on behalf of the ILSI North America
Deputy Executive Director
ILSI North America